

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

CORNERSTONE CREDIT UNION	§	
LEAGUE and CONSUMER DATA	§	
INDUSTRY ASSOCIATION,	§	
	§	CIVIL NO. 4:25-cv-00016
v.	§	
	§	
CONSUMER FINANCIAL	§	
PROTECTION BUREAU and	§	
RUSSELL VOUGHT in his official	§	
capacity as Acting Director of the	§	
CFPB	§	

**[PROPOSED] ORDER & FINAL JUDGMENT**

Before the Court is the Parties' Joint Motion for Entry of Consent Judgment (Dkt. #31). Having considered the Motion, relevant docket entries, and applicable law, the Court **GRANTS** the Motion.

The Court hereby **VACATES** the rule entitled *Prohibition on Creditors and Consumer Reporting Agencies Concerning Medical Information (Regulation V)*, 90 Fed. Reg. 3276 (Jan. 14, 2025). That rule generally prohibits consumer reporting agencies from including medical debt information on consumer reports furnished to creditors. As alleged in Count I of the Complaint (Dkt. #1), that violates 15 U.S.C. § 1681b(g)(1) and the Administrative Procedure Act, 5 U.S.C. § 706(2), because § 1681b(g)(1) expressly allows consumer reporting agencies to include properly coded medical debt on consumer reports furnished to creditors.

The above-entitled rule also generally prohibits creditors from considering medical debt information when making credit determinations. As alleged in Count II of the Complaint (Dkt. #1), that violates 15 U.S.C. § 1681b(g)(2) and the

Administrative Procedure Act, 5 U.S.C. § 706(2), because § 1681b(g)(2) expressly allows creditors to consider properly coded medical debt when making a credit determination.

The above-entitled rule also prohibits CRAs from including medical debt information on consumer reports furnished to creditors if a CRA has reason to believe the creditor is otherwise prohibited from considering the information, including by state law. As alleged in Count III of the Complaint (Dkt. #1), that violates FCRA and the Administrative Procedure Act, 5 U.S.C. § 706(2), because no part of FCRA's permissible purposes provision—15 U.S.C. § 1681b(a)—gives the Bureau the authority to bar CRAs from furnishing properly coded medical debt information in consumer reports provided to creditors, including based on state law requirements.

All other claims in the Complaint, including those contained in Count IV, are **DISMISSED** with prejudice. This final judgment is issued pursuant to Federal Rule of Civil Procedure 58(a).

**SO ORDERED** on this \_\_ day of \_\_\_\_\_ .

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SEAN D. JORDAN  
UNITED STATES DISTRICT JUDGE